

Natalie Gauci
National Vice President – Independent Consultant

July 15, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580
RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," but some areas of the proposed rule will make it very difficult, if not impossible, for me to sell Arbonne products and sponsor people into the business. Therefore, I believe that in its present form, it could prevent me from continuing as an Arbonne Independent Consultant. I will take this letter to address each area of my concern with the proposed Rule.

The first one, and the one I think is the most confusing and restrictive section of the proposed rule is the 7-day waiting period to sign up new Consultants. Not only do Arbonne Starter Kits cost a nominal amount of money, the proposed waiting period gives the wrong impression that there might be something wrong the Arbonne opportunity. One of the key elements to my success in this business has been capturing the enthusiasm and immediate results prospects experience with Arbonne products; the waiting period would potentially limit my ability to grow my business. This type of 7-day waiting period is not required in any other industry that I am aware of, and I cannot understand why the Network Marketing/Direct Selling Industries need to be treated any differently. This is a viable way of doing business, and I believe we should be treated equitably.

Next is that the proposed rule calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. I fear being penalized by the impression a lawsuit would leave, even if I have done nothing wrong. As a consumer, I feel that I need to take some responsibility in this arena and do my due diligence before I make a purchasing decision. If someone has ever had a concern in this arena they can take it upon themselves to do their homework, but providing this for everyone would put unnecessary fear in the minds of those that are not concerned, and have no reason to be.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I am glad to provide references, but identity theft is a reality we live with in today's world and I am very uncomfortable with giving out personal information about individuals, without their permission or knowledge, to strangers. Also, sharing this information could damage the business relationship of references

with those involved in other companies or businesses, or provide an unfair advantage to competitors. In order to get the proposed list of 10 prior Independent Consultants, I would need to send the address of a prospect to the Arbonne corporate office in California and then wait for the list. The proposed rule also includes the language, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" and prospects will be understandably concerned about their privacy. I would find it an invasion of privacy to disclose personal data, for my business purposes.

I have been an Arbonne Independent Consultant for more than 12 years, and have been fortunate enough to hold a top leadership position with the company for the past 4 years. I became a Consultant because I felt strongly this industry allows someone like me to live and work for a lifestyle that others only dream is possible. I love the products, and Arbonne as a company has an incredible corporate team and vehicle for people to better their lives if they so choose. Since starting my Arbonne business, I have developed a team of approximately 4,000 Independent Consultants across the country and together we are helping our families enjoy better lives.

I truly appreciate the work of the FTC in protecting consumers, but I believe this proposed new rule would have many detrimental (and unintentional) consequences and I hope there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like me.

Thank you for your time and understanding.

Sincerely,

Natalie Gauci